

wireless carriers to advertise and price their services and equipment nationally. The national mobile wireless service providers have very large advertising budgets and include detailed price information in their ads. Placing ads at different locations with different price offers would be costly and could create consumer confusion. This is an industry with a high incidence of customer service calls, which would be more difficult to service if each area had a different pricing plan. Furthermore, business consumers often want the same price and service for all their employees, regardless of their location.

54. The trend in consumer demand is for mobile wireless service that covers a large geographic region, and consumers increasingly are purchasing national calling plans. Initially, most cell phones were designed for fixed use in an automobile,⁴⁶ and roaming service outside of the local region typically was very expensive. The FCC awarded the first cellular licenses on a local (MSA and RSA) basis, and competition began along local lines. In the early years of the cellular industry in the U.S., cellular providers offered calling plans that were tailored to local conditions. The FCC's first report on CMRS competition indicates that in 1994 Bell Atlantic offered a "package with a low monthly fee (\$14.99) and relatively modest per minute charges (thirty-five cents) for calls made in, and received from, a relatively small geographic area. However, calls outside the defined area are significantly more expensive (ninety-nine cents per minute)."⁴⁷ The high per-minute prices for out-of-area calls indicate that cellular was marketed primarily as a service that offered mobile telecommunications for local users.
55. Over time, mobile wireless service providers responded to consumer demands by providing services that encompassed much larger areas without roaming charges and included long distance service at no extra cost. Consolidation and clustering by carriers and broader FCC license areas for PCS service facilitated this trend. The areas in which customers could make calls without incurring roaming charges increased from the MSA level, to combinations of nearby CMAs and adjoining RSAs, and then grew

⁴⁶ FCC, "First Report," *In the Matter of Implementation of Section 6002(B) of the Omnibus Budget Reconciliation Act of 1993 Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services*, FCC 95-317, August 18, 1995, ¶ 21. (Hereinafter "First CMRS Report.")

to encompass entire states and ultimately almost the entire nation. Mobile wireless providers also included long distance service without additional charges. The cell phone became the personal phone that could be used anywhere for calls to any location, usually at the same per-minute cost.

56. Although some new consumers still purchase regional calling plans, the trend clearly is toward national plans, and regional plans with increased geographic coverage. Cingular presently does not offer to new customers any calling plans with a geographic scope smaller than an entire state. AWS local service areas are at least a full state and in most cases include several states, although they may have some areas where roaming is not free.⁴⁸ Furthermore, the pricing of regional plans appears to be driven by the prices of national plans. Most major carriers price regional and national plans similarly, suggesting that they prefer that consumers subscribe to national plans.
57. According to Cingular's Chief Marketing Officer, Marc Lefar, the trend toward national calling plans was driven in part by a desire to alleviate customer confusion about the geographic boundaries of their rate plans. Inadvertent use of wireless phones outside of these boundaries incurred large roaming charges and led to significant customer dissatisfaction, as well as increased carrier call center volume and other customer care costs.⁴⁹ Cingular has found that national plans have lower churn, and consequently more favorable financial results, and provide a better customer experience resulting in fewer customer service calls.⁵⁰ In the six months from August 2003 to January 2004, Cingular's subscriber count for nationwide plans grew 11.6%, while its subscriber count for local and regional plans grew only 3%.⁵¹ AWS indicates that 59 percent of February 2004 gross adds were on national plans.⁵²

⁴⁷ First CMRS Report, ¶ 23.

⁴⁸ AWS Local Plan coverage maps on website; Declaration of Marc P. Lefar, ¶ 12. There are some legacy consumers on service plans with smaller geographical coverage.

⁴⁹ Declaration of Marc P. Lefar, ¶ 9.

⁵⁰ Declaration of Marc P. Lefar, ¶ 9.

⁵¹ Declaration of Marc P. Lefar, ¶ 11.

⁵² Conversation with Mike Sievert, AWS Chief Marketing Officer.

58. Cingular has been emphasizing national calling plans for over a year and since February 2004 has implemented a comprehensive strategy of selling only national and large regional plans. Cingular's goal is to add the vast majority of new customers to national plans by year-end 2004.⁵³ Cingular believes that "half of Verizon's base is on America's choice plans" and "70% of intake is on America's choice plans." Qwest and AT&T (the former parent of AWS) have both recently announced their intention to introduce "national coverage and calling plans."⁵⁴
59. The pricing of mobile wireless plans is determined by national rather than local competitive factors. This is illustrated by the fact that the prices for most mobile wireless plans do not vary according to where they are purchased. I have surveyed the prices for mobile wireless plans offered on the Internet by the six national carriers: Cingular, AWS, Verizon Wireless, T-Mobile, Sprint PCS, and Nextel. All of these carriers offer national plans that provide for free roaming on the carriers' "preferred" networks over the entire U.S.⁵⁵ In the case of regional plans, the home area for Cingular is, at a minimum, the carrier's network across the entire state.⁵⁶ Based on a sampling of cities in large states such as California and Texas, it appears that, with the exception of Nextel, the other national carriers also offer regional plans that encompass an entire state at minimum.
60. I surveyed the lowest prices available in each of the largest 100 metropolitan areas in the U.S.⁵⁷ for national and regional plans that provided a minimum of 500 "anytime"

⁵³ Declaration of Marc P. Lefar, ¶ 11.

⁵⁴ Associated Press, "Two Telephone Companies are Poised to crowd the Cell Phone Market by Going National," February 29, 2004.

⁵⁵ Each carrier provides a map showing its "preferred" network coverage. Generally, this network consists of the carrier's own digital network facilities plus parts of other carriers' networks where the customer's carrier has a specific roaming agreement. For the plans included in my survey, the customer pays roaming charges in any areas where the customer's phone is in service off the "preferred" network.

⁵⁶ Declaration of Marc P. Lefar, ¶ 12.

⁵⁷ The list of the largest 100 metropolitan areas is based on the 100 most populated Cellular Market Areas ("CMAs"), which follow Metropolitan Statistical Area and Rural Statistical Area boundaries ("MSAs" and "RSAs", respectively). For a single zip code within each CMA and I collected the least expensive pricing plan that included at least 500 "anytime" minutes for each carrier. In order to qualify for the lowest price plans, contracts were required for some carriers. The plans collected were from the chosen zip code, and a carrier's coverage may or may not span the entire CMA. Because this was a website survey, its scope was limited. For example, it is possible that there are deals available in stores that are not available on a carrier's website, and vice versa. Prices may have been different prior to conducting this survey and may change after the completion

minutes. I also surveyed prices in 50 small rural areas. I describe the results of this survey in the Appendix. The prices offered by each carrier show remarkable similarity across geographic areas. The Appendix also examines whether pricing for telephone handsets exhibits geographic price variation.

61. My analysis of national and regional prices for calling plans and handset prices shows little to no variation that is correlated with industry structure at a local level. This supports the conclusion that pricing of mobile wireless service is national and that the competitive effects from the proposed merger should be analyzed in a national geographic market.

VII. The transaction is unlikely to lead to higher prices or other anticompetitive effects

62. The merger is unlikely to raise prices or slow the rate of decline of prices in the mobile wireless industry. The proposed merger does not significantly impact the structure of the industry. Currently there are six major national mobile wireless providers and many regional providers. The merger changes the number of national providers from six to five and leaves unchanged the number of regional providers. The characteristics of the firms and consumers in this industry make competitive effects from coordinated behavior unlikely. There is also no evidence that the merger will raise prices or slow the rate of price decline due to unilateral effects. The increase in concentration at the national level from the merger is modest and prices do not correlate with industry structure at the local level. Finally, the merged company will be able to improve service quality for existing services and roll out advanced services for more consumers than each company could accomplish on its own.
63. A merger is unlikely to have any competitive effect if it does not significantly change the structure of the industry. While my analysis focuses primarily on the ability of the other national carriers to discipline an attempted price increase by the merged firm, I

of this survey. Each plan was based on a given number of minutes (at least 500) and variation from this level could yield different results. The website survey did not investigate variations in the following: minutes sharing; mobile-to-mobile minutes; data services (e.g., email, text messaging); extra features (e.g., call forwarding, three-way calling); or adjustments to night/weekend minute periods.

note that additional constraints are available in the form of regional carriers and resellers (including “Virtual Network Operators” such as Virgin Mobile that resell service under a brand that is very attractive to some users). For instance, in my Internet price survey of the top 100 CMAs, I noted the active participation of the regional carriers ALLTEL, US Cellular, Metro PCS, and two AWS affiliates. At least one of these regional carriers was present in 43 of the top 100 CMAs.

64. I have examined concentration in the mobile wireless industry at the national level from the perspectives of total and flow revenue shares. In the revenue share calculations I included each company’s service revenue and equipment sales and other revenue. I obtained subscriber and revenue data for each of the six national carriers from company financial statements.⁵⁸ For the revenue share of regional carriers, I computed the difference between the nationwide subscriber count and the subscribers of the six national carriers and multiplied the difference by the average revenue per subscriber for the national carriers.⁵⁹ Table 3 shows that the Herfindahl-Hirschman Index (“HHI”) based on total revenues is currently 1,573 and would increase by 450 points to 2,023 post-merger.⁶⁰

⁵⁸ Revenue data collected from 10-Ks, Annual Reports and announced 4Q2003 results. Verizon Wireless's 2003 data from Cellco Partnership d/b/a Verizon Wireless 8-K filed January 29, 2004. ALLTEL 2003 data from 2003 10-K. T-Mobile 2003 revenues are an estimate based on 3Q03 year-to-date results.

⁵⁹ Sources of subscriber data: FCC CMRS Competition Reports; company 10-K reports; company Q4 2003 financial results; CTIA website.

⁶⁰ Computing HHIs based on service revenue rather than service, equipment, and other revenue leads to similar HHIs and HHI changes.

Table 3: HHIs Based on National Revenue Share⁶¹

Carrier	Revenue Share		Post-Merger
	2002	2003	
Verizon Wireless	20.1%	21.0%	21.0%
Cingular Wireless	15.3%	14.4%	30.0%
AT&T Wireless	16.3%	15.6%	
SprintPCS	12.6%	11.8%	11.8%
T-Mobile	5.2%	7.5%	7.5%
Nextel	9.1%	10.1%	10.1%
Regional Carriers	21.4%	19.6%	19.6%
Total	100.0%	100.0%	100.0%
Revenue HHI	1,630	1,573	2,023
Revenue HHI Change		(57)	450

65. I used the same revenue data to compute concentration based on revenue flow shares. Table 4 shows that the concentration of revenue flow share is currently 2,081 and would go up 128 points to 2,210 post-merger. The flow share is in many respects a better indication of competition in the market for mobile than total revenue share because it measures how consumers are currently choosing between the different providers of wireless services.

⁶¹ The regional competitors do not compete throughout the entire nation. In 2003, ALLTEL's national revenue share was 4.4%, and US Cellular's national revenue share was 2.4%. Sources: FCC CMRS Competition Reports; company 10-K reports; company Q4 2003 financial results; CTIA website. T-Mobile 2003 revenues are an estimate based on 3Q03 year-to-date results.

Table 4: HHI Based on National Revenue Flow Share⁶²

Carrier	Flow Share 2003	Post- Merger
Verizon Wireless	28.8%	28.8%
Cingular Wireless	6.8%	16.3%
AT&T Wireless	9.5%	
SprintPCS	5.5%	5.5%
T-Mobile	26.8%	26.8%
Nextel	18.7%	18.7%
Regional Carriers	3.9%	3.9%
Total	100.0%	100.0%
Flow Revenue HHI	2,081	2,210
Flow Revenue HHI Change		128

66. After the merger, five national mobile wireless carriers and many regional carriers, resellers, and value-added providers will compete for mobile wireless customers. The combined companies' market share will be 30 percent on a total revenue basis and 16 percent on a flow revenue basis. The low flow share reflects the recent aggressive competition from Verizon Wireless, T-Mobile, and Nextel.
67. The DOJ/FTC Horizontal Merger Guidelines consider a post-merger HHI of 1,800 as the threshold value for a highly concentrated industry, and the Agencies rarely challenge a merger in industries unless the post-merger HHI significantly exceeds 2,000.⁶³ The concentrations statistics for the mobile wireless industry do not suggest that competition in the industry would be adversely affected by the merger. The post-merger HHI based on revenues is around 2,000, the post-merger HHI based on flow revenues is around 2,200, and the merger increases the flow revenue HHI by just over 100 points. These are modest structural changes.
68. The structural analysis alone leads to a conclusion that the proposed merger does not raise significant antitrust concerns. Putting structure aside, I also show that the

⁶² Sources: FCC CMRS Competition Reports; company 10-K reports; company Q4 2003 financial results; CTIA website. T-Mobile 2003 revenues are an estimate based on 3Q03 year-to-date results.

⁶³ -The U.S. antitrust agencies challenged mergers in the telecommunications industry that affected 214 product markets during FY 1999-2003. . Only one of these markets had a post-merger HHI below 2,400. See U.S. Department of Justice and Federal Trade Commission, Merger Challenges Data, Fiscal Years 1999—2003, December 18, 2003, Table 6. Available at <http://www.usdoj.gov/atr/public/201898.htm>.

characteristics of the market for mobile wireless services indicate that anticompetitive effects are unlikely to result from the merger.

69. A merger may lead to higher prices as a result of a coordinated or a unilateral effect. Both effects refer to the ways in which competition may occur in an industry.
70. A price increase as a coordinated effect may occur if firms restrain themselves from competing in order to sustain higher prices. A coordinated effect requires cooperation by two or more firms in the industry and for this reason is associated with implicit or explicit collusion. Coordinating firms refrain from cutting price or increasing output even though such an action would increase their short-term profits because they are aware that other firms in the industry are likely to do the same, and this would lower profits over the longer term.⁶⁴
71. Coordinated interactions can be successful only if all of several conditions apply.⁶⁵
 - a) The relative costs and benefits of coordination must be comparable across all of the coordinating firms; otherwise some firms would defect from the coordinated conduct.
 - b) Non-coordinating firms must face limits on their ability to expand capacity. These firms are sometimes called industry “mavericks”.
 - c) Firms must be able to monitor the coordination in price or output by other firms.
 - d) Coordinating firms must be able to punish firms that fail to coordinate their price or output.
 - e) Firms cannot have opportunities for product or other service innovations that would allow them to achieve discrete competitive advantages while escaping punishment by other firms.
72. Coordinated effects are unlikely in the market for mobile wireless services. The industry has a history of price and quality competition and rapid innovation.⁶⁶ Prices have declined rapidly, particularly after the licensing of new PCS spectrum in 1995.

⁶⁴ “Coordinated interaction is comprised of actions by a group of firms that are profitable for each of them only as a result of the accommodating reactions of the others.” Horizontal Merger Guidelines, §2.1.

⁶⁵ “Successful coordinated interaction entails reaching terms of coordination that are profitable to the firms involved and an ability to detect and punish deviations that would undermine the coordinated interaction.” *Id.*

⁶⁶ See, for example, Eighth CMRS Report, pages 30-48, 57-82.

Wireless companies provided new services such as voicemail, caller ID, SMS, and mobile Internet offerings, and developed innovative pricing plans. After the merger, there would be at least 5 major national carriers and more than a dozen regional players serving numerous areas across the country.

73. Cingular and AWS have at times been the innovators of new services and pricing plans, however their conduct is not so different from industry trends to classify them as “maverick” competitors. The history of price declines and the large mix of services and price offerings is inconsistent with a stable relationship required to maintain collusive outcomes. Wireless providers compete in different dimensions, including equipment subsidies as well as monthly price, number of free minutes and how they break down by off-peak and on-peak, roaming charges, and other services, such as on-net free calling. Wireless providers also differ in the quality of service and the amount of excess capacity. The latter, in particular, creates different incentives for price-cutting by different firms in the industry. Newer entrants such as T-Mobile and regional competitors such as MetroPCS are eager to take business from the more established firms and have the capacity to do so. It is unlikely that relationships among the wireless suppliers will become less complex and varied after the merger.
74. A unilateral effect occurs when a merger increases a firm’s profit-maximizing price under the assumption that other firms in the industry do not change their prices. This usually occurs when the merger eliminates a product or service that many consumers consider to be the next-best substitute for the product or service sold by one of the merging firms.
75. A merger is unlikely to cause a price increase due to a unilateral effect if there are other firms with similar cost characteristics that sell products that consumers regard as close substitutes for the products sold by the merging firms. Furthermore, even if there are unilateral competitive effects, they can be offset by marginal efficiencies that cause the merged firm to choose a lower post-merger price.⁶⁷

⁶⁷ Churn data show that consumers leaving AWS and Cingular do not choose the other carrier in proportion to their market shares. This suggests that many consumers do not regard Cingular and AWS to be next-best substitutes.

76. There is some product differentiation in the mobile wireless service industry as a result of differences in call quality, dropped and blocked calls, geographic coverage, and customer service. However, the fact that prices for mobile wireless service plans are similar across the major national wireless service providers suggests that product differentiation is not a primary determinant of competition in this industry.
77. To the extent that there is product differentiation in this industry, the consumer satisfaction surveys by Consumer Reports suggest that the merger would not significantly alter the choices available to mobile wireless consumers. Presently, many consumers of wireless services rate other carriers as superior to both Cingular and AWS. Consumer Reports surveyed consumer evaluations of the major national wireless carriers in 12 metropolitan areas. Table 5 summarizes the scores based on "overall satisfaction."⁶⁸ Verizon Wireless was ranked highest in every metropolitan area, with an average score of 73. Based on the average score in all 12 areas, AWS was last and Cingular was fourth. A year earlier, Consumer Reports had rated AWS second behind Verizon Wireless for "overall satisfaction" in a survey of six metropolitan areas.⁶⁹

⁶⁸ Consumer Reports 2004, p. 16.

⁶⁹ Based on the average of scores for "overall satisfaction" in the six metropolitan areas surveyed. Consumer Reports 2003, p. 17.

Table 5: Consumer Satisfaction Scores⁷⁰

	Verizon Wireless	T-Mobile	Nextel	AWS	Cingular	Sprint PCS
Atlanta	75	70	66	64	64	63
Boston	73		66	58	62	62
Chicago	71	66	69	63	67	60
Dallas	75	65		66	67	68
Denver	73	65		65		63
Houston	70	67		62	67	65
Los Angeles	72	63	67	58	63	64
New York	71	59	62	58		58
Philadelphia	73	64	67	61	64	60
San Francisco	73			64	60	61
Seattle	74	67		62		65
Washington, D.C.	74		68	63	61	60
Average	72.8	65.1	66.4	62.0	63.9	62.4

78. Currently, many consumers rate Verizon Wireless's service as superior to the services offered by the other carriers. Average scores are about equal for AWS, Cingular, and Sprint PCS, and they are somewhat higher for T-Mobile and Nextel.
79. Post-merger, and absent any reposition of the services offered by each firm, many consumers would still find Sprint PCS to be a comparable alternative to service by the merged firms and many consumers would continue to assign a higher satisfaction score to Verizon Wireless, T-Mobile, and Nextel. Furthermore, according to the Consumer Reports survey, consumers would have better alternatives to the merged firm at every metropolitan area in the survey.⁷¹
80. The merger will benefit consumers by making the combined company a better competitor. Presently, there is a gap between the perceived quality of Cingular and AWS and the perceived quality of the market leader, Verizon Wireless. This gap is likely to widen if the Cingular and AWS are unable to roll out advanced high-speed digital services in most of the nation.

⁷⁰ Consumer Reports, 2004, p. 16.

⁷¹ It is likely that WLNP is increasing competition in the mobile wireless industry by making it even easier for consumers to switch carriers.

81. The merger will help to close this gap. The merger promotes competition by creating a better competitor. The merged firm will be able to compete across all dimensions valued by consumers, including service quality and scope of voice and data services. I noted that coordinated behavior is unlikely in the mobile wireless industry. In the absence of coordinated behavior, competition is enhanced when consumers consider the service offerings of firms to be closer substitutes.
82. The DOJ/FTC merger guidelines note that unilateral effects are unlikely when products are relatively undifferentiated and if the post-merger market share of the merged firm is less than 35 percent.⁷² On a national level, the merger will result in a combined market share of AWS and Cingular of 30.0% based on national revenues and 16.3% based on flow shares. There is some product differentiation in the mobile wireless industry, however it is not particularly large relative to many other industries.
83. Pricing is driven primarily by national competition as evidenced by the fact that mobile wireless prices are not higher in RSAs served by only a few networks. Nor is there evidence of unilateral effects where a carrier has a share greater than 35 percent. In its Eighth CMRS Report, the FCC notes that wireless competition is vigorous even in areas that have relatively few networks: "Moreover, while it appears that, on average, a smaller number of operators are serving rural areas than urban areas, this difference does not necessarily indicate that effective CMRS competition does not exist in rural areas. ... On the contrary,... despite the differing structure of rural markets, effective CMRS competition does exist in rural areas."⁷³ The evidence is that six national, facilities-based CMRS carriers are not necessary for effective competition. Some rural areas have service from only one or two of the largest carriers, yet competition continues to thrive in those areas. The FCC cites data showing that, "...the average

⁷² "Where the merging firms have a combined market share of at least thirty-five percent, merged firms may find it profitable to raise price and reduce joint output below the sum of their premerger outputs because the lost markups on the foregone sales may be outweighed by the resulting price increase on the merged base of sales." See Horizontal Merger Guidelines, §2.22.

⁷³ Eighth CMRS Report, ¶ 13.

price of mobile telephone service in rural areas appears to be very similar to the average price in urban areas.”⁷⁴

84. The evidence supports that conclusion that price competition does not decline significantly in regions with only 1 or 2 major carriers rather than 5 to 7 major carriers. My Internet price survey found that major carriers charge the same prices in 50 small RSAs as they do in the top 100 CMAs, with very few exceptions that do not appear to be related to measures of concentration.⁷⁵ This is powerful evidence that the merger of Cingular and AWS is in the public interest and not likely to diminish competition.
85. The merger is unlikely to cause significant price increases from either coordinated or unilateral effects. The merger is likely to reduce operating costs in the short run and will substantially reduce the marginal costs incurred to expand capacity and introduce new high-speed services. These efficiencies will promote lower quality-adjusted prices, which are likely to be larger than any price effects.
86. The merger is also very unlikely to raise prices by reducing inter-modal competition between wireline and wireless services. The proposed merger will have no effect on competition in wireline telephony. Wireless service may improve and prices may fall to the point where more consumers are willing to do without landline service, but it is unlikely that the merged company could change this dynamic. Because mobile wireless competition is national in scope, the merged company is unlikely to raise wireless prices only in its' parents' wireline service territories. If it attempted to do so, given the competitive wireless market, it could not stop or slow wireline to wireless substitution. It would simply lose share, as other wireless carriers would be eager to take the business. Given that the combined company would lack the ability to control such a dynamic, it would have no incentive not to aggressively compete to win such customers. It is also unlikely that competition would be affected by bundling wireline and wireless services. Many telecommunications firms offer bundled services. Rather

⁷⁴ Eighth CMRS Report, ¶ 118.

⁷⁵ My survey covered the smallest 40 of Telephia's "Top 500" as well as the 11 RSAs where Cingular and AWS have overlapping licenses.

than raising prices, bundling has been yet another instrument of price competition in the telecommunications industry.

Appendix

- A1. This Appendix reports the results of a survey of prices for national and regional calling plans offered by the major national and selected regional mobile wireless service providers. I examined prices from the websites of the six national carriers as well as the regional carriers ALLTEL, US Cellular, MetroPCS, and AWS affiliates suggested by the AWS website. The results of the survey are shown in Table A-1 for the top 100 CMAs.
- A2. The national plans showed very little variation.⁷⁶ For Verizon Wireless, Sprint PCS, T-Mobile, Nextel, US Cellular, and MetroPCS, the price was the same for plans purchased at every location. The price was \$49.99 for Verizon Wireless, \$45 for Sprint PCS and ALLTEL, \$39.99 for T-Mobile and Nextel, \$75 for US Cellular, and \$40 for MetroPCS. For Cingular, the price was \$49.99 at all but four locations offering GAIT plans with dual network nationwide coverage: Tampa, FL; Birmingham, AL; Mobile, AL and Lakeland, FL. For plans purchased at these locations the price was \$55.00. For AWS, the price was \$39.99 in all locations except for San Juan, PR, where it was \$49.99.⁷⁷
- A3. Technology, rather than competition, explains the higher prices for Cingular's national plans in the four locations in Alabama and Florida. The prices offered by other carriers for national plans are no different for plans purchased at these locations than they are for plans purchased at other locations. The higher prices for Cingular in these areas relate to the local network configuration: It is my understanding that Cingular has not

⁷⁶ These prices are for a bucket of 500 or more "anytime" minutes per month with on-net roaming for a one or two-year contract. These prices do not include activation charges, where applicable, or the price of purchasing a phone. I analyze equipment discounts later in this section. The carriers provided differing amounts of minutes for the quoted prices. Cingular (except for GAIT plans), AT&T Wireless (except for Puerto Rico), T-Mobile, and ALLTEL provided 600 minutes; while Verizon Wireless, Sprint PCS, and Nextel provided 500 minutes. US Cellular provided 700 minutes. MetroPCS provided unlimited minutes with free long distance from the home calling area. Although the MetroPCS plan did not allow for free nationwide roaming, it was categorized with the "national" plans to distinguish it from the cheaper MetroPCS plan that did not include free long distance.

⁷⁷ In four areas (Richmond, VA, Greenville, SC, Charleston, SC, and Columbia, SC), AWS did not offer service, but its website directed potential customers to AWS's affiliate SunCom. SunCom offered national plans for \$99.95 in all four locations. In two additional areas where AWS did not offer service (Cincinnati, OH and Dayton, OH), AWS's affiliate, Cincinnati Bell, offered service for \$69.99. In some areas AWS offered no service and did not suggest an affiliate.

yet upgraded its network to GSM in these four areas. Therefore, a customer purchasing a phone and a plan in these service areas will require a dual-mode (“GAIT”) phone to use the TDMA network in the home area and the GSM network when roaming in areas where Cingular operates a GSM-only network. Consumers that purchase this service can access Cingular’s national TDMA, analog, and GSM networks at no additional cost. Because these plans have more coverage than other Cingular plans, the price of this plan is higher to cover Cingular’s higher costs.

- A4. The mobile wireless providers also offer regional plans to customers in the top 100 CMAs. Regional plans are geared toward subscribers who make and receive most of their calls from within the service area designated by the carrier for its regional plans. Table A summarizes and provides a comparison between the carriers’ most common national and regional plans. Carriers choose different pricing strategies to position their national and regional plans. For instance, Cingular offers 600 minutes for both plans, but charges \$49.99 for the national plan and \$39.99 for the regional plan.⁷⁸ Verizon Wireless also charges \$49.99 for its national plan and \$39.99 for its regional plan, but only offers 500 minutes. Sprint PCS charges \$45.00 for both plans while providing 500 minutes for the national plan and twice as many minutes for the regional plan. T-Mobile charges \$10 more for its regional plan than its national plan, but offers five times as many minutes for the increased price, although its plan differs in other features, such as free weekend minutes. At the time of my Internet price survey, at the \$39.99 price point, AWS offered the same number of minutes for both national and regional plans. There may be differences between AWS’s minutes for national and regional plans at higher or lower price points. Nextel has the same price and number of minutes for both packages, offering free long distance for its national plan but not its regional plan, while providing unlimited “walkie-talkie” time for its regional plan but not its national plan. ALLTEL, a regional carrier, offers more minutes at a lower price on its regional plan, as compared to its national plan. US Cellular, another regional carrier, charges a higher price than the national carriers for its national plan. MetroPCS

⁷⁸ These price/minute combinations are for Cingular’s standard, non-GAIT plans.

charges \$5 per month to add unlimited nationwide free long distance calls from the home calling area.

- A5. Comparing price per minute, if the customer were to use all of the allotted minutes and not run over, US Cellular's national plan is the most expensive at 10.7 cents per minute, which is not surprising considering that a regional carrier offering national service is likely to incur higher costs. T-Mobile's regional plan is the least expensive for those who have high monthly usage but do not travel. The effective price is only 1.7 cents per minute for customers that use all 3,000 minutes. T-Mobile's plan is more expensive than other regional calling plans for customers that use only 500 minutes per month. The comparison is complicated further by other features that are not offered by all providers. For example, Cingular offers rollover of unused minutes from month to month. This reduces the effective price per minute for anyone who does not use the full bucket in one month but runs over the allotment in a later month. Carriers also differ in the availability and definition of free night and weekend minutes.

Table A: Most Common Monthly Price Plans by Carrier

Carrier	National			Regional		
	Price	Anytime Minutes	Price/Minute	Price	Anytime Minutes	Price/Minute
1 Cingular ¹	\$49.99	600	\$0.083	\$39.99	600	\$0.067
2 AT&T Wireless	\$39.99	600	\$0.067	\$39.99	600	\$0.067
3 T-Mobile USA	\$39.99	600	\$0.067	\$49.99	3000	\$0.017
4 Verizon Wireless	\$49.99	500	\$0.100	\$39.99	500	\$0.080
5 Sprint PCS	\$45.00	500	\$0.090	\$45.00	1000	\$0.045
6 Nextel ²	\$39.99	500	\$0.080	\$39.99	500	\$0.080
7 ALLTEL	\$45.00	600	\$0.075	\$39.95	1000	\$0.040
8 US Cellular	\$75.00	700	\$0.107	\$40.00	500	\$0.080
9 MetroPCS	\$40.00	Unlimited	N/A	\$35.00	Unlimited	N/A

¹ Cingular provides rollover of unused minutes for its national and regional plans.

² Nextel offers push to talk ("walkie-talkie") service as part of its plans.

- A6. The mobile wireless carriers differ somewhat in their approaches to long distance and roaming charges in their regional plans,⁷⁹ but each carrier is consistent in its pricing of

⁷⁹ While subscribers to regional plans of the top six wireless carriers will not incur roaming charges within the established regional coverage areas, Cingular, AWS, and Sprint PCS regional plans also include nationwide long distance, provided that the subscriber is within the designated regional home service area. However, subscribers

the same plan across different areas of the country, with the few exceptions described here. Sprint PCS, Nextel, ALLTEL, T-Mobile and MetroPCS charge the same price for their regional plans in all of the top 100 CMAs they serve. Sprint PCS charges \$45.00 for 1,000 minutes; Nextel charges \$39.99 for 500 minutes; ALLTEL charges \$39.95 for 1,000 minutes; T-Mobile charges \$49.99 for 3,000 minutes; and MetroPCS charges \$35.00 for unlimited minutes. AWS charges \$39.99 for 600 minutes in every CMA except San Juan, PR, where it charges \$49.99.⁸⁰ Cingular charges \$39.99 for its regional plan in every CMA except the four requiring dual-mode GAIT phones. Cingular serves three of these CMAs (Tampa, FL, Birmingham, AL, and Lakeland, FL) with a \$49.99 plan and provides no regional plan in Mobile, AL. Cingular's "anytime" minutes for its regional plans vary from 500 to 600 minutes. The Cingular regional calling plan provides for 600 minutes in 59 of the CMAs, 550 minutes in 17 CMAs, and 500 minutes in 3 CMAs. There is no systematic relationship between the number of minutes offered and share concentration in these CMAs. Verizon Wireless charges \$39.99 for 500 minutes in most CMAs. Some CMAs near the Gulf of Mexico coast from Texas to Florida get 600 minutes for \$39.99. CMAs in the Northeast and Mid-Atlantic regions (former NYNEX and Bell Atlantic service territory, except for a few CMAs in Pennsylvania) have regional plans offering 700 minutes for \$59.99. US Cellular is offering a \$35.00 price for 500 minutes in Knoxville, TN, while they are offering service in 5 other CMAs for \$40.00, but with minutes varying from 500 to 700 minutes for these plans. MetroPCS offers unlimited usage on a prepaid basis with no contract and charges over \$100 for their cheapest phone. The service areas are limited to a greater metropolitan area; they are not statewide.

- A7. To further investigate the extent of price competition, I expanded my analysis to a group of RSAs that are much smaller than the top 100 CMAs. I examined 11 RSAs in which Cingular's and AWS's coverage overlap, 40 of the 500 smallest U.S. localities

to regional plans offered by Verizon Wireless and Nextel incur charges of 20 cents per minute for long distance. T-Mobile charges 20 cents per minute for calls made from within the regional coverage area to outside the region.

⁸⁰ SunCom, an AT&T affiliate, charges \$49.95 for unlimited anytime minutes in the four MSAs noted in the survey of national plans.

tracked by Telephia.⁸¹ This analysis includes Alltel and US Cellular (the two largest regional carriers), in addition to the six national carriers. Table A-2 in the Appendix shows the price data for each carrier for each of the 40 smallest “markets”, as determined by Telephia, and Table A-3 shows price data for each carrier for each of the 11 RSAs where Cingular and AWS have overlapping licenses.

- A8. Of the 40 smallest rural localities that I analyzed, shown on table A-2, I found very little variation in monthly price or allotted anytime minutes. Based on information from company websites, there are numerous rural localities in which three or fewer of the eight carriers are operating. In some of these localities one or more of the eight carriers holds spectrum but is not actively operating. With only a few exceptions, each of these RSAs had the same prices and allotted anytime minutes for national and regional calling plans as the top 100 CMAs, most of which support six or more competitors. Even when only one or two of the top eight carriers were present, they priced their services in the same manner as in the more competitive markets. In the national plans, the sole variation was a Cingular plan in Vicksburg, MS. For the regional plans, besides the Cingular plan in Vicksburg, MS, the only other variations were Cingular offering 550 minutes in Madisonville, KY, and US Cellular charging \$5 less in Fairmont, WV, than in other cities. My analysis of small rural areas showed little more price variation than my analysis of the top 100 CMAs.
- A9. Table A-3 shows that in each of the 11 RSAs where Cingular and AWS have overlapping licenses, the monthly plan prices and allotted anytime minutes for the wireless carriers show no variation between RSAs. All are priced the same as at the most common package for the top 100 CMAs for each carrier, with the exceptions of US Cellular, which offers the 500 minute regional plan for the lower \$35 price and Verizon Wireless offering 600 minutes for \$39.99. The variation of the 11 RSAs from the top 100 CMAs is no greater than the variation found within the top 100 CMAs, and all of the monthly plan prices and allotted anytime minute combinations found on Table A-3 can be found in the top 100 CMAs.

⁸¹ As listed in Telephia’s “Top 500 Markets” spreadsheet.

A10. My survey of websites for the national competitors in the top 100 CMAs looked at the plans that provided at least 500 “anytime” minutes of use and did not incorporate factors such as peak versus off-peak usage, long-distance or roaming charges. To consider these additional factors, I analyzed the price plan data available from Current Analysis.⁸² This database includes all of the price plans for the national carriers, and is regularly updated. The database enables calculation of the effective price based on the best available plan offered by each carrier given a user profile of location, minutes of usage, percent peak usage, percent roaming usage, and percent long distance usage. I constructed a user profile consisting of 500 minutes of use, 40% peak usage, 1% roaming usage (3% for regional plans), and 25% long distance usage. I then calculated the effective price, i.e. cost to the subscriber of this usage, for all of the 40 cities covered by the data. The effective price of “local” plans shows geographic variation only for Verizon Wireless and T-Mobile.⁸³ Analysis of “national” plans shows geographic variation in the effective price for Cingular in Tampa, FL, and Verizon Wireless but no variation for AWS or Sprint PCS.⁸⁴ Where there is variation in price, there is no apparent relationship between price and subscriber concentration. For example, Verizon Wireless’s national plan results in an effective price of \$38.44 in the 4 CMAs with the highest HHIs (based on subscriber shares in the local CMA), and \$43.44 in 11 of the 12 CMAs with the lowest HHIs. This exercise shows little or no variation in effective prices across different CMAs.

A11. Consumers often purchase a new handset when subscribing to a new service and subsidized pricing of handsets could be a source of geographic price variation. I surveyed the cost of the least expensive cell phone offered on the company website by each of the national mobile wireless providers in the top 100 metropolitan areas. The results are reported in Table B. Cingular, AWS, T-Mobile, and Sprint PCS all offered a free phone in every metropolitan area. Verizon Wireless’s lowest cost phone was \$9.99 in every metropolitan area. Nextel’s lowest cost phone was \$24.99, again in every metropolitan area.

⁸² Data provided by AWS.

⁸³ Current Analysis includes both local and regional plans in this category.

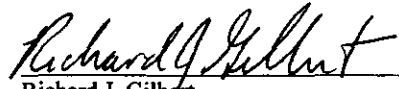
Table B: Lowest Equipment Prices Available on Company Websites

	Carrier	Price
1	Cingular	\$0.00
2	AT&T Wireless	\$0.00
3	T-Mobile USA	\$0.00
4	Verizon Wireless	\$9.99
5	Sprint PCS	\$0.00
6	Nextel	\$24.99

A12. In order to determine whether handset pricing contributes to geographic price variation I determined the average subsidy for 4 classes of handsets (Black and White, Color, Camera, and Specialty) in each of the CMAs covered by Current Analysis handset pricing data. While there is variation in the handset subsidy across CMAs, there is no apparent relationship to subscriber market shares or spectrum share at the CMA level. This is true whether the prices are for 2 year or 1 year contracts.

⁸⁴ I include both “on-net” and “anywhere” plans, and choose the least expensive for the usage profile.

I declare under penalty of perjury that the foregoing is true and correct.


Richard J. Gilbert

Executed on March 17, 2004

Table A-1 (National)
Lowest Price National Plan With At Least 500 Anytime Minutes by Carrier and CMA

Rank	CMA	CMA		Cingular		AT&T Wireless		T-Mobile		Verizon Wireless		Sprint PCS		Nextel	
		Sample Zip Code	Population# ('000)	Rate	Min	Rate	Min	Rate	Min	Rate	Min	Rate	Min	Rate	Min
1	New York, NY	10001	16,330	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
2	Los Angeles, CA	90001	15,920	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
3	Chicago, IL	60601	8,232	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
4	Dallas, TX	75283	5,320	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
5	Philadelphia, PA	19101	5,067	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
6	Detroit, MI	48201	4,816	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
7	Houston, TX	77001	4,547	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
8	Boston, MA	02241	4,312	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
9	Washington, DC	20001	4,270	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
10	San Francisco, CA	94102	4,198	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
11	Miami, FL	33255	3,993	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
12	Atlanta, GA	30303	3,931	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
13	Phoenix, AZ	85003	3,233	N/A	N/A	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
14	Minneapolis, MN	55401	2,904	N/A	N/A	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
15	San Diego, CA	92155	2,858	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
16	Baltimore, MD	21201	2,541	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
17	St Louis, MO	63150	2,535	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
18	Denver, CO	80201	2,500	N/A	N/A	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
19	Seattle, WA	98145	2,406	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
20	Tampa, FL ¹	33663	2,317	\$55.00	500	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
21	San Juan, PR	00901	2,177	\$49.99	600	\$49.99	500	N/A	N/A	N/A	N/A	\$45.00	500	N/A	N/A
22	Pittsburgh, PA	15201	2,025	N/A	N/A	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
23	Cleveland, OH	44108	1,869	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
24	Portland, OR	97201	1,854	N/A	N/A	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
25	San Jose, CA	95101	1,714	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
26	Sacramento, CA	98529	1,689	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
27	Kansas City, MO	64119	1,658	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
28	San Antonio, TX	78201	1,604	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
29	Cincinnati, OH	45275	1,571	\$49.99	600	N/A	N/A	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
30	Milwaukee, WI	53202	1,512	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
31	Indianapolis, IN	46201	1,512	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
32	Orlando, FL	32801	1,496	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
33	Las Vegas, NV	89101	1,482	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
34	Columbus, OH	43085	1,425	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500

Table A-1 (National)
Lowest Price National Plan With At Least 500 Anytime Minutes by Carrier and CMA

Rank	CMA	CMA		Cingular		AT&T Wireless		T-Mobile		Verizon Wireless		Sprint PCS		Nextel	
		Sample Zip Code	Population* ('000)	Rate	Min	Rate	Min	Rate	Min	Rate	Min	Rate	Min	Rate	Min
35	Salt Lake City, UT	84101	1,422	N/A	N/A	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
36	Nashville, TN	37201	1,273	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
37	Austin, TX	73301	1,224	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
38	New Orleans, LA	70112	1,206	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
39	West Palm Beach, FL	33415	1,177	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
40	Buffalo, NY	14201	1,167	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
41	Jacksonville, FL	32099	1,157	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
42	Hartford, CT	06155	1,153	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
43	Memphis, TN	37501	1,129	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
44	Greensboro, NC	27401	1,115	\$49.99	600	\$39.99	600	N/A	N/A	\$49.99	500	\$45.00	500	\$39.99	500
45	Oklahoma City, OK	73102	1,070	\$49.99	600	\$39.99	600	\$39.99	600	N/A	N/A	\$45.00	500	\$39.99	500
46	Norfolk, VA	23501	1,054	N/A	N/A	N/A	N/A	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
47	Charlotte, NC	28201	1,051	\$49.99	600	\$39.99	600	N/A	N/A	\$49.99	500	\$45.00	500	\$39.99	500
48	Rochester, NY	14602	1,044	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
49	Raleigh, NC	27601	1,017	\$49.99	600	\$39.99	600	N/A	N/A	\$49.99	500	\$45.00	500	\$39.99	500
50	Louisville, KY	40202	981	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
51	Providence, RI	02903	971	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
52	Birmingham, AL ¹	35201	953	\$55.00	500	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
53	Bridgeport, CT	06604	892	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
54	Honolulu, HI	96813	883	N/A	N/A	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
55	Tucson, AZ	85701	874	N/A	N/A	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
56	Tulsa, OK	74103	859	\$49.99	600	\$39.99	600	\$39.99	600	N/A	N/A	\$45.00	500	\$39.99	500
57	Dayton, OH	45401	849	\$49.99	600	N/A	N/A	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
58	Albany, NY	12202	846	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
59	Grand Rapids, MI	49503	834	N/A	N/A	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
60	New Haven, CT	06510	827	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
61	Fresno, CA	93650	822	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
62	Toledo, OH	43601	808	N/A	N/A	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
63	Oxnard, CA	93030	768	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
64	New Brunswick, NJ	08901	763	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
65	Greenville, SC	29601	762	\$49.99	600	N/A	N/A	N/A	N/A	\$49.99	500	\$45.00	500	\$39.99	500
66	Worcester, MA	01602	758	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
67	Allentown, PA	18101	750	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500
68	Tacoma, WA	98402	721	\$49.99	600	\$39.99	600	\$39.99	600	\$49.99	500	\$45.00	500	\$39.99	500

Table A-1 (National)
Lowest Price National Plan With At Least 500 Anytime Minutes by Carrier and CMA

Rank	CMA	Sample Population #	Zip Code	CMA Population* (000)	Cingular	AT&T Wireless	T-Mobile	Verizon Wireless	Sprint PCS	Nextel
69	Akron, OH	44301	701	\$49.99	600	\$39.99	600	\$39.99	500	\$39.99
70	Richmond, VA	23219	698	N/A	N/A	N/A	600	\$49.99	500	\$39.99
71	El Paso, TX	79901	695	N/A	N/A	\$39.99	600	\$49.99	500	\$39.99
72	Omaha, NE	68102	686	N/A	N/A	\$39.99	600	N/A	500	\$39.99
73	Bakersfield, CA	93301	682	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
74	Northeast Pennsylvania, PA	18503	676	N/A	N/A	\$39.99	600	\$49.99	500	\$39.99
75	Albuquerque, NM	87101	664	N/A	N/A	\$39.99	600	\$49.99	500	\$39.99
76	Wilmington, DE	19801	663	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
77	Syracuse, NY	13202	648	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
78	Gary, IN	46402	636	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
79	Long Branch, NJ	07740	627	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
80	Baton Rouge, LA	70801	615	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
81	Springfield, MA	01103	610	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
82	McAllen, TX	78501	601	\$49.99	600	N/A	600	\$49.99	500	\$39.99
83	Little Rock, AR	72201	596	\$49.99	600	\$39.99	N/A	N/A	500	\$39.99
84	Knoxville, TN	37902	589	\$49.99	600	\$39.99	N/A	\$49.99	500	\$39.99
85	Stockton, CA	95202	578	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
86	Colorado Springs, CO	80903	559	N/A	N/A	\$39.99	600	\$49.99	500	\$39.99
87	Charleston, SC	29401	557	\$49.99	600	N/A	N/A	\$49.99	500	\$39.99
88	Columbia, SC	29201	552	\$49.99	600	N/A	N/A	\$49.99	500	\$39.99
89	Mobile, AL	36602	551	\$55.00	500	\$39.99	600	\$49.99	500	\$39.99
90	New Bedford, MA	02740	539	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
91	Citrus, FL	34433	536	N/A	N/A	\$39.99	600	\$49.99	500	\$39.99
92	Vallejo, CA	94589	531	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
93	Ocean, NJ	07712	524	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
94	Wichita, KS	67202	522	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
95	Harrisburg, PA	17101	515	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
96	Lansing, MI	48906	513	N/A	N/A	\$39.99	600	\$49.99	500	\$39.99
97	Flint, MI	48502	509	\$49.99	600	\$39.99	600	\$49.99	500	\$39.99
98	Newport News, VA	23601	499	N/A	N/A	N/A	600	\$49.99	500	\$39.99
99	Lakeland, FL	33801	497	\$55.00	500	\$39.99	600	\$49.99	500	\$39.99
100	Cabarrus, NC	28107	493	\$49.99	600	\$39.99	N/A	\$49.99	500	\$39.99